

EXHIBIT E

Bourne, Joseph C.

From: Bourne, Joseph C.
Sent: Monday, April 6, 2020 11:33 AM
To: Howard, Jim
Cc: Taskai, Annamaria; Simon, Alexander L.
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Jim and Annamaria,

Thank you for speaking with me last week.

Following up on our conversation, 50-100 products (ASINs) is not a sufficient sample of data for Plaintiffs. It appears we are too far apart to reach resolution of this issue. Accordingly, it appears we are at an impasse with respect to transactional data.

Please provide a response concerning the remaining substantive document requests that we discussed. If I do not hear from you by close of business Wednesday, I will presume we are at an impasse on that issue as well.

Best,
Joe

From: Howard, Jim <JimHoward@dwt.com>
Sent: Thursday, March 26, 2020 2:50 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Cc: Taskai, Annamaria <AnnamariaTaskai@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

That works for me, as long as it also works for Annamaria.

James Howard | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8336 | Fax: (206) 757-7336
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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Thursday, March 26, 2020 10:58 AM
To: Howard, Jim <JimHoward@dwt.com>
Cc: Taskai, Annamaria <AnnamariaTaskai@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Thanks, Jim. How about Monday at 1 pm central/11 am pacific?

From: Howard, Jim <JimHoward@dwt.com>
Sent: Thursday, March 26, 2020 12:54 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Cc: Taskai, Annamaria <AnnamariaTaskai@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: Re: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe. I'm working on a response today. We should also set up a call.

Sent from my iPhone

On Mar 26, 2020, at 10:48 AM, Bourne, Joseph C. <jbourne@pswlaw.com> wrote:

[EXTERNAL]

Hi Jim,

Following up on the below. Can you confirm whether Amazon will produce its transactional data for those ASINs, and an expected time frame for that production?

I assume this won't be a problem because your concern with transactional data was that it's too hard to search or locate without ASINs (which we now have), but we need confirmation.

Thank you.

Joe

From: Bourne, Joseph C.
Sent: Tuesday, March 24, 2020 2:28 PM
To: Howard, Jim <JimHoward@dwt.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Jim,

Just following up on this. Have you confirmed with the client that they will produce the transactional data for this list of approximately 5,300 ASINs?

Thanks,
Joe

From: Bourne, Joseph C.
Sent: Thursday, March 19, 2020 12:49 PM
To: Howard, Jim <JimHoward@dwt.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Yes, that is correct. Thank you.

From: Howard, Jim <JimHoward@dwt.com>
Sent: Thursday, March 19, 2020 12:45 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Joe,

Thanks for the email. To clarify, are you asking Amazon to pull data for 5,300 ASINS? I just want to be sure before we follow up with them.

-Jim

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Email: jimhoward@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>

Sent: Thursday, March 19, 2020 9:51 AM

To: Howard, Jim <JimHoward@dwt.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>

Cc: Simon, Alexander L. <asimon@pswlaw.com>

Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Jim and Annamaria,

I hope you are safe and healthy. I know times are challenging and many of us are working remotely. Nevertheless, we need to follow up about this subpoena.

First, we were able to come up with a smaller list of products and to sort it by ASIN. Please see attached. There are approximately 5,300 ASINs. My understanding is this will simplify the task on Amazon's end considerably.

Please confirm you will produce Amazon's transactional data for these products identified by ASIN, and let me know when you expect that production to occur.

This should also simplify the response to some of our requests, like star ratings and customer reviews for products—which can now be identified by ASIN as well.

Finally, please advise to what extent you are willing to produce substantive documents (i.e., not transactional data), or let me know if there is a good time to meet and confer by phone. It appears we are at an impasse based on prior communications about this issue (including your repeated lack of a response), but if you want to discuss, let me know.

Joe

From: Bourne, Joseph C.

Sent: Friday, March 6, 2020 10:13 AM

To: Howard, Jim <JimHoward@dwt.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>

Cc: Simon, Alexander L. <asimon@pswlaw.com>

Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Jim,

We are discussing on our side whether there is a reasonable way to limit the UPCs for the transactional data that will still get us sufficient data. We will get back to you on that next week.

I understand that your client wants to bill paralegal time for this project at \$150 per hour. I assume that is not what Amazon pays its in house paralegals on an hourly basis, but rather is a higher amount that it wants to charge for their time. Can you please confirm?

I also have not seen a response as to whether Amazon will agree to search for and produce any relevant substantive documents (i.e., not transactional data) as described in my previous letter and the emails below. That letter is attached again for your reference here. I assume this means Amazon will not, and that we are at an impasse on this issue. If you disagree, please let me know what categories of documents, if any, Amazon is willing to search for and produce if it can locate them.

Finally, could you please let me know a few good times next week to schedule a call? I'm not sure it will be necessary, but it would be good to have something on the calendar in case we do need a call.

Thanks,
Joe

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From: Howard, Jim <JimHoward@dwt.com>
Sent: Wednesday, March 4, 2020 1:37 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe,

Since we don't have any reasonable way to search in the fashion you would like, our only alternative is to propose a search by ASINs. Or worst case scenario, by converting UPCs into ASINs, which we are forced to do here, given your focus on UPCs. As Annamaria indicated, converting one UPC into ASINs took approximately 70 minutes. The data would then need to be pulled for all the resulting ASINs, which would take even more time.

Given this, we proposed 10. I understand from the below that you have rejected that number. Do you have an alternative proposal on the number of UPCs that you believe Amazon should search?

-Jim

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Email: jimhoward@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Wednesday, March 4, 2020 11:28 AM
To: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>; Howard, Jim <JimHoward@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Annamaria,

Thank you for letting me know your client's position. Ours is that transactional data for 10 UPCs is not adequate. We will have to seek judicial intervention.

Transactional data aside, I take it your client is unwilling to search for or produce substantive documents, as sought in the subpoena and narrowed by my prior letter, which I mentioned on our last call and followed up about in the emails below. If that understanding is incorrect and there are certain substantive categories of documents your client is willing to search for and produce, please let me know by close of business tomorrow so we can consider your client's position. Discovery is about to close and we can't wait any longer.

Best regards,
Joe

From: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Sent: Tuesday, February 25, 2020 6:26 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>; Howard, Jim <JimHoward@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe,

Thank you, I'm doing much better.

I had word from Amazon and while there is a way to convert UPCs into ASINs, it is a very manual and complicated process. Every UPC has to be converted into a bar code one by one manually. Then that bar code has to be put into another tool that shows which ASINs are connected to that bar code. Further manual Excel process required to narrow the scope to products sold in the US. Average 5-7 ASINs are connected to one bar code. Then every ASIN needs to be checked up in a third tool to see when it was created in order to run the ASIN query that will provide the sales data per ASIN which then need to be redacted.

Amazon went through the above manual process for one UPC. That particular has yielded 6 ASINs and the time spent on it was 70 minutes.

Amazon obviously cannot go through this heavily manual process for 16,000 UPCs. What we can offer is to randomly pick 10 UPCs and obtain the sales data for those. As Jim mentioned on the phone, in case of a data request that requires extensive manual process Amazon is billing a \$150/hr fee for paralegal work. That would mean approximately \$1,470 for 11.6 hour of work for 10 UPCs.

Please let me know if this is acceptable for you.

Thank you,

Annamaria Taskai | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
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Email: annamariataskai@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Tuesday, February 25, 2020 7:59 AM
To: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>; Howard, Jim <JimHoward@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Annamaria,

Thank you for letting me know. I look forward to seeing your response.

I hope you're feeling better!

Joe

From: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Sent: Monday, February 24, 2020 9:25 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>; Howard, Jim <JimHoward@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe,

Apologies, I was taken ill unexpectedly and my request to Amazon got delayed. I'll try to send you an answer no later than EOD tomorrow.

Thank you,

Annamaria Taskai | Davis Wright Tremaine LLP
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Tel: (206) 757-8019 | Fax: (206) 757-7019
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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Friday, February 21, 2020 10:40 AM
To: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Annamaria,

Just following up about this. I believe you were going to get back to me this week—is that something you're still going to be able to do?

We need to know whether you can search Amazon's transactional data by UPC, as we have provided you the list of UPCs attached to my email last Friday. And we need some response from Amazon concerning my clients' substantive document requests, as narrowed and focused by my previous letter, which I re-sent to you last Thursday.

Thanks,
Joe

From: Bourne, Joseph C.
Sent: Friday, February 14, 2020 9:32 AM
To: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Cc: Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Annamaria,

Attached is a list of universal product codes for the products we are interested in. Can you please confirm whether Amazon can sort or otherwise search its transactional data by UPC?

Thanks,
Joe

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From: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Sent: Thursday, February 13, 2020 8:35 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Thank you very much for sending it, Joe. Yes, you are correct, Jim Howard joined us on the call.

Thank you,

Annamaria Taskai | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8019 | Fax: (206) 757-7019
Email: annamariataskai@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Thursday, February 13, 2020 2:50 PM
To: Taskai, Annamaria <AnnamariaTaskai@dwt.com>; Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Annamaria,

It was good talking with you and your colleague (I think it was Jim – I didn't catch his last name) a few minutes ago. Attached is the letter I mentioned near the end of our call.

Thanks,
Joe

From: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Sent: Friday, January 31, 2020 8:06 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>; Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Yes, please do. Thank you!

Annamaria Taskai | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Friday, January 31, 2020 1:41 PM
To: Taskai, Annamaria <AnnamariaTaskai@dwt.com>; Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

That works, thanks! Should I call you at the number below?

From: Taskai, Annamaria <AnnamariaTaskai@dwt.com>
Sent: Friday, January 31, 2020 2:22 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>; Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe, it is nice to meet you electronically. Would 2/13 2pm PST work for you?

Annamaria Taskai | Davis Wright Tremaine LLP
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From: Bourne, Joseph C. <jbourne@pswlaw.com>

Sent: Friday, January 31, 2020 8:47 AM

To: Ahn, Deana <DeanaAhn@dwt.com>

Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>;

Simon, Alexander L. <asimon@pswlaw.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>

Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Deana – thank you for letting me know.

Annamaria – could we set a time for a phone call on February 13 or 14? Please let me know what works for you so we can get it in the calendar. I will be out of the office on vacation from 2/4 to 2/12 with limited phone service.

Thanks,

Joe

From: Ahn, Deana <DeanaAhn@dwt.com>

Sent: Thursday, January 30, 2020 11:06 PM

To: Bourne, Joseph C. <jbourne@pswlaw.com>

Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>;

Simon, Alexander L. <asimon@pswlaw.com>; Taskai, Annamaria <AnnamariaTaskai@dwt.com>

Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Joe:

My colleague Annamaria Taskai (copied here) will be handling this matter going forward. Unfortunately, Annamaria will be out of the office tomorrow and will be unavailable on Monday due to witness prep. Please connect with Annamaria to schedule a call for a date/time that would work for both of you. Thank you.

-Deana

Deana Ahn | Davis Wright Tremaine LLP

Attorney

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From: Bourne, Joseph C. <jbourne@pswlaw.com>

Sent: Thursday, January 30, 2020 9:27 AM

To: Ahn, Deana <DeanaAhn@dwt.com>

Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>;

Simon, Alexander L. <asimon@pswlaw.com>

Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Thanks, Deana. Monday morning is good (I leave for vacation on Tuesday and think it would be good to touch base before then). Please let me know if there's a particular time that's good for you.

Best,
Joe

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From: Ahn, Deana <DeanaAhn@dwt.com>
Sent: Wednesday, January 29, 2020 10:10 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Joe:

I apologize for the delay. I'm trying to gather information where Hannah left off and also trying to determine whether another colleague or I will be handling this matter. As such, it would be helpful if we could schedule a call for next week when we have more information. Would Monday morning work?

-Deana

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Wednesday, January 29, 2020 8:06 AM
To: Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Deana,

I'm writing to follow up on the emails below. I still have not seen a response. Can you please confirm that you received them?

Please also let me know when you are available to talk.

Thanks,
Joe

From: Bourne, Joseph C.
Sent: Monday, January 27, 2020 5:52 PM
To: 'Ard, Hannah' <HannahArd@dwt.com>; 'Ahn, Deana' <DeanaAhn@dwt.com>
Cc: 'Crawford, Donna' <DonnaCrawford@dwt.com>; 'Santiago, Marianne' <MarianneSantiago@dwt.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Deana,

I'm writing to follow up about my email below from last week.

Can you let me know when you have a good time to talk this week? We need to follow up about both Amazon's transactional data (as discussed on the last call) and the substantive requests in the subpoena.

Please see the attached correspondence, which is the latest on the issues raised in the more substantive requests. Several months ago, I discussed with Molly Tullman, and then later with Hannah Ard, a willingness to focus on the transactional data requests for the time being and put these other, more substantive ones on the back burner. As I indicated previously, we are open to discussing compromise and various means by which my clients may procure the documents they need to prosecute this litigation. However, it is now almost February, and fact discovery closes on March 19—so we now need to pick up that piece of the conversation.

We need to reach an agreement about what Amazon will search for and produce sooner rather than later. We would certainly prefer to avoid motion practice, but we need to protect our rights and can't afford to run out the clock on fact discovery without reaching an agreement with Amazon.

Thanks,
Joe

From: Bourne, Joseph C.
Sent: Friday, January 24, 2020 10:13 AM
To: Ard, Hannah <HannahArd@dwt.com>; Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Hannah,

Thank you for letting me know. Good luck at your next stop.

Thank you for speaking with me on January 6 (as well as your colleague – I'm sorry I don't remember his name). I know we both respectively were going to follow up about some things with our clients respectively and circle back.

Deana, could you please let me know when you are available for a phone call so we can keep this moving? Early next week would be great if you have a day/time that works for you.

Thanks,
Joe

Joseph C. Bourne
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From: Ard, Hannah <HannahArd@dwt.com>
Sent: Friday, January 24, 2020 8:28 AM
To: Bourne, Joseph C. <jbourne@pswlaw.com>; Ahn, Deana <DeanaAhn@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe:

Today is my last day at Davis Wright Tremaine. I am transferring this matter to Deana Ahn, another attorney here, who is copied on this email. I have provided her with an update of where things currently stand. Feel free to reach out to her.

Take care,
Hannah

From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Friday, December 20, 2019 2:19 PM
To: Ard, Hannah <HannahArd@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Perfect, talk to you then. Have a good holiday season and new year!

Joseph C. Bourne
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From: Ard, Hannah [<mailto:HannahArd@dwt.com>]
Sent: Friday, December 20, 2019 4:13 PM
To: Bourne, Joseph C.
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe,

How about Monday the 6th at 9:30 Pacific which I think would be 11:30 Central?

Hannah

From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Friday, December 20, 2019 1:07 PM
To: Ard, Hannah <HannahArd@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Hannah,

Thank you for the quick follow up. I have a hearing in the mid-morning on Friday that week, but I'm pretty flexible earlier in the week right now. Right now I could talk anytime Monday or Tuesday, Wednesday 11 am central or later, or Thursday before 1 pm or after 3 pm central. Please let me know what works so we can put it on calendar.

Best,
Joe

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From: Ard, Hannah <HannahArd@dwt.com>
Sent: Thursday, December 19, 2019 1:23 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe:

I spoke to the Amazon relationship partner about the meet and confer that you and I had. I'm wondering if we could all get on a call sometime the week of January 6? Please let me know your availability and I will set something up.

Thank you.

Hannah

From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Friday, December 13, 2019 9:16 AM
To: Ard, Hannah <HannahArd@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Thanks, you too!

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From: Ard, Hannah [<mailto:HannahArd@dwt.com>]
Sent: Friday, December 13, 2019 11:15 AM
To: Bourne, Joseph C.
Cc: Crawford, Donna; Pearson, Matthew A.; Simon, Alexander L.
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe,

That works for me. I will expect your call then. I can be reached at 206-757-8111.

Have a good weekend.

Hannah

From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Friday, December 13, 2019 8:14 AM
To: Ard, Hannah <HannahArd@dwt.com>; Tullman, Molly <MollyTullman@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Hannah,

How about Tuesday at 10 am pacific?

Thanks,
Joe

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From: Ard, Hannah [<mailto:HannahArd@dwt.com>]
Sent: Thursday, December 12, 2019 11:35 AM
To: Bourne, Joseph C.; Tullman, Molly
Cc: Crawford, Donna; Pearson, Matthew A.; Simon, Alexander L.
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Hi Joe:

I am available any day next week after 9:30am Pacific, so please let me know a date and time that works for you.

Hannah

Hannah Ard | Davis Wright Tremaine LLP

Attorney
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8111 | Fax: (206) 757-7700
Email: hannahard@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | **Seattle** | Washington, D.C.

From: Bourne, Joseph C. <jbourn@pswlaw.com>
Sent: Thursday, December 12, 2019 7:13 AM
To: Tullman, Molly <MollyTullman@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>; Ard, Hannah <HannahArd@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Thanks, Molly.

Hannah – do you have a good time to talk early next week?

Joe

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From: Tullman, Molly <MollyTullman@dwt.com>
Sent: Wednesday, December 11, 2019 4:26 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>; Ard, Hannah <HannahArd@dwt.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Joe,

Thanks for checking in. I will actually be going on leave later this week for several months so my colleague Hannah, copied here, will be taking over this matter and handling on behalf of Amazon going forward. Please reach out to her to schedule a meet and confer call.

Best,
Molly

Molly Newland Tullman | Davis Wright Tremain LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8137 | Fax: (206) 757-7137
Email: mollytullman@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Tuesday, December 10, 2019 11:43 AM
To: Tullman, Molly <MollyTullman@dwt.com>; Bourne, Joseph C. <jbourne@pswlaw.com>; Santiago, Marianne <MarianneSantiago@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Hi Molly,

Do you have time for another meet and confer early next week?

Thanks,
Joe

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From: Tullman, Molly [<mailto:MollyTullman@dwt.com>]
Sent: Tuesday, November 05, 2019 12:55 PM
To: Bourne, Joseph C.; Santiago, Marianne
Cc: Crawford, Donna; Pearson, Matthew A.; Simon, Alexander L.
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Sounds good. Thanks.

Molly Newland Tullman | Davis Wright Tremaine LLP
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Tel: (206) 757-8137 | Fax: (206) 757-7137
Email: mollytullman@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Tuesday, November 05, 2019 7:58 AM
To: Tullman, Molly <MollyTullman@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>;
Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Molly,

8 am pacific on Friday, 11/8, works. I'll call you then at the number listed below.

Thanks,
Joe

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From: Tullman, Molly <MollyTullman@dwt.com>
Sent: Monday, November 4, 2019 8:36 PM
To: Bourne, Joseph C. <jbourne@pswlaw.com>; Santiago, Marianne <MarianneSantiago@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Joe,

Thanks. Would 8:00 am pacific on Friday 11/8 work for you?

--Molly

Molly Newland Tullman | Davis Wright Tremaine LLP

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Monday, November 04, 2019 9:06 AM
To: Tullman, Molly <MollyTullman@dwt.com>; Santiago, Marianne <MarianneSantiago@dwt.com>
Cc: Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Molly,

Would this Friday work for you? I am available all day.

Thanks,
Joe

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From: Tullman, Molly [<mailto:MollyTullman@dwt.com>]
Sent: Thursday, October 31, 2019 3:31 PM
To: Bourne, Joseph C.; Santiago, Marianne
Cc: Crawford, Donna; Pearson, Matthew A.; Simon, Alexander L.
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Joe,

Thanks for following up. I think it would be useful to set up a call to discuss further. Can you please provide me with some days and times next week you are available and we can find a time that works?

Best,
Molly

Molly Newland Tullman | Davis Wright Tremaine LLP

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Email: mollytullman@dwt.com | Website: www.dwt.com

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From: Bourne, Joseph C. <jbourne@pswlaw.com>
Sent: Wednesday, October 30, 2019 8:19 AM
To: Santiago, Marianne <MarianneSantiago@dwt.com>
Cc: Tullman, Molly <MollyTullman@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Pearson, Matthew A. <mapearson@pswlaw.com>; Simon, Alexander L. <asimon@pswlaw.com>
Subject: RE: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

[EXTERNAL]

Dear Marianne and all,

Thank you for serving these objections in response to the amended subpoena we served on Amazon.

I'm writing to follow up on the attached correspondence, which I sent to Molly and Donna by email on October 7. This is equally applicable to your new objections to the reissued subpoena. Also attached again for your reference is a copy of the protective order entered by the court in this MDL.

Please let me know if we should expect a written response or if we should schedule a call to discuss (and if so, when). As indicated in the letter, our goal is to work out a compromise with Amazon, and to avoid having to seek court intervention.

Best,
Joe

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From: Santiago, Marianne [<mailto:MarianneSantiago@dwt.com>]
Sent: Wednesday, October 16, 2019 1:56 PM
To: Bourne, Joseph C.
Cc: Tullman, Molly; Crawford, Donna
Subject: RESPONSE: SUB127051-B - In re Keurig Antitrust Litigation

Good day, Mr. Bourne.

Attached are the responses on behalf of Amazon. The same is being served by Certified Mail today.

Marianne Santiago | Davis Wright Tremaine LLP
Litigation Paralegal
920 Fifth Avenue, Suite 3300, Seattle, WA 98104
Fax: (206) 757-7700
Website: www.dwt.com

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